

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEY CORPORATE CAPITAL, INC.,

Plaintiff,

v.

BNP PARIBAS S.A.,

Defendant.

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Court for the Southern District of New York, I, Martin Eisenberg, a member of good standing of the Bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

John M. Cooney
Arnstein & Lehr, LLP
200 East Las Olas Boulevard
Suite 1700
Ft. Lauderdale, FL 33301
Telephone: (954) 713-7620
Fax: (954) 713-7770
Email: JMCoooney@Arnstein.com

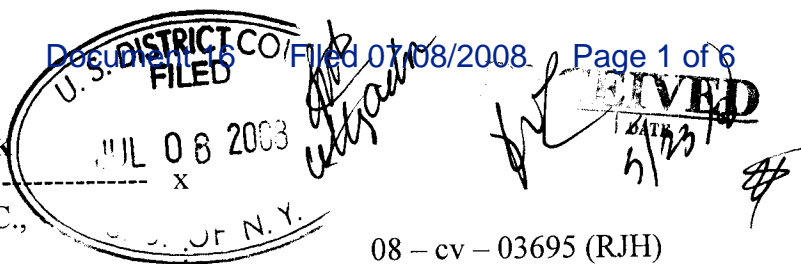
John M. Cooney is a member in good standing of the Bar of the States of Florida and North Carolina. There are no pending disciplinary proceedings against Mr. Cooney.

Dated: May 20, 2008

New York, New York

Respectfully submitted,

Martin Eisenberg (ME0015)
THOMPSON HINE LLP
335 Madison Avenue, 12th Floor
New York, New York 10017
Tel: (212) 908-3933
Fax: (212) 344-6101



JUL 08 2008
08-05-656179

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
KEY CORPORATE CAPITAL, INC.,

Plaintiff,

v.

BNP PARIBAS S.A.,

Defendant.
----- X

: 08 – cv – 03695 (RJH)

:
: **AFFIDAVIT OF**
: **MARTIN EISENBERG**
: **IN SUPPORT OF MOTION**
: **TO ADMIT COUNSEL**
: **PRO HAC VICE**

State of New York)
) ss:
County of New York)

MARTIN EISENBERG, ESQ., being duly sworn, hereby deposes and says as follows:


1. I am a partner with the law firm of Thompson Hine LLP, counsel for the Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit John M. Cooney as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York. I am also admitted to practice before the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. John M. Cooney is a partner with the law firm of Arnstein & Lehr LLP. I believe Mr. Cooney to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
4. Accordingly, I am pleased to move for the admission of John M. Cooney *pro hac vice*.
5. I respectfully submit a proposed order granting the admission of John M. Cooney *pro hac vice* which is attached hereto as Exhibit A, be granted

WHEREFORE, it is respectfully requested that the motion to admit John M. Cooney *pro hac vice* to represent Plaintiff in the above captioned matter, be granted.

Dated: May 20, 2008

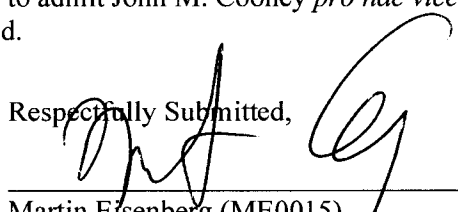
New York, New York

Notarized:


Notary

Doreen Pando
Notary Public, State of New York
No. 01PA5083699
Qualified in New York County
Commission Expires August 18, 2009

Respectfully Submitted,



Martin Eisenberg (ME0015)
THOMPSON HINE LLP
335 Madison Avenue, 12th Floor
New York, New York 10017
Tel: (212) 908-3933
Fax: (212) 344-6101

Supreme Court of Florida

Certificate of Good Standing

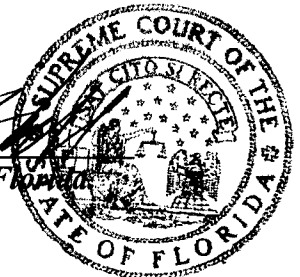
*I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do
hereby certify that*

JOHN MARTIN COONEY

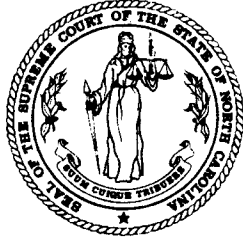
*was admitted as an attorney and counselor entitled to practice law in all the
Courts of the State of Florida on September 21, 1990, is presently in good
standing, and that the private and professional character of the attorney
appear to be good.*

*WITNESS my hand and the Seal of the
Supreme Court of Florida at Tallahassee,
the Capital, this May 9, 2008.*


Clerk of the Supreme Court of Florida



Supreme Court OF THE STATE OF NORTH CAROLINA



I, Christie Speir Cameron, Clerk of the Supreme Court of North Carolina, do hereby certify that on April 5, 1996, a license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

JOHN M. COONEY

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

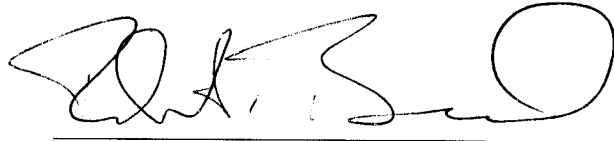
WITNESS my hand and the Seal of the Supreme Court of North Carolina at the office in Raleigh, this *May 12, 2008*

Christie S. Cameron

*Christie Speir Cameron
Clerk of the Supreme Court
of the State of North Carolina*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 7th day of July 2008, a true and correct copy of the foregoing was served electronically through the Court's ECF System to the parties listed therein.

A handwritten signature in black ink, appearing to read 'R. T. Barnard', is written over a horizontal line.

Robert T. Barnard
THOMPSON HINE LLP
335 Madison Avenue, 12th Floor
New York, New York 10017
Tel: (212) 908-3922
Fax: (212) 344-6101

*One of the Attorneys for
Key Corporate Capital, Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
KEY CORPORATE CAPITAL, INC.,

Plaintiff,

v.

BNP PARIBAS S.A.,

Defendant.
----- x

x

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08 – cv – 03695 (RJH)

:

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

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:

:

x

Upon motion of Martin Eisenberg, Esq., attorney for Plaintiff Key Corporate Capital, Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

John M. Cooney
Arnstein & Lehr, LLP
200 East Las Olas Boulevard
Suite 1700
Ft. Lauderdale, FL 33301
Tel: (954) 713-7620
Fax: (954) 713-7770
Email: JMCooney@Arnstein.com

is admitted to practice *pro hac vice* as counsel for Plaintiff, Key Corporate Capital, Inc., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: May __, 2008

New York, New York

Hon. Richard J. Holwell
United States District Judge
Southern District of New York